



NIXON PEABODY LLP
ATTORNEYS AT LAW

NIXONPEABODY.COM
@NIXONPEABODYLLP

Anjali Vohra
Associate
avohra@nixonpeabody.com

Nixon Peabody LLP
799 9th Street NW
Suite 500
Washington, DC 20001-4501
202-585-8000

August 15, 2016

VIA EMAIL AND FIRST CLASS MAIL

The Hon. Karen V. Gregory
Secretary of Federal Maritime Commission
800 North Capitol St.
Room 1046
Washington, D.C. 20573

Re: Docket No. 15-11 – Ovchinnikov v. Hitrinov

Dear Ms. Gregory:

Enclosed for filing in the above-captioned matter are an original true copy and five (5) additional copies of:

1. Respondents' Response to Motion to Intervene

If you have any questions, please do not hesitate to contact me.

Best regards,

Anjali Vohra

Enclosures

FEDERAL MARITIME COMMISSION

WASHINGTON, D.C.

DOCKET NO. 15-11

IGOR OVCHINNIKOV, ET AL

v.

MICHAEL HITRINOV, ET AL

Consolidated With

DOCKET NO. 1953(I)

KAIRAT NURGAZINOV, ET AL

v.

MICHAEL HITRINOV, ET AL

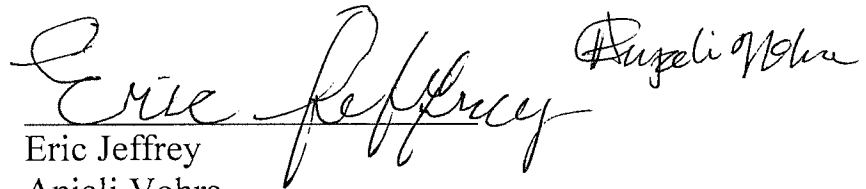
RESPONDENTS' RESPONSE TO MOTION TO INTERVENE

Pursuant to FMC Rules, 69 and 71 Respondents Empire Lines United and Michael Hitrinov state that they have no objection to Mr. Sergey Kapustin's Motion to Intervene.

Respondents further note, without substantive comment, that Mr. Kapustin's concern regarding Complainants' misuse of Global's documents appears to be substantiated by Appendix 3 to Complainants' Reply to Respondents' Response to Order for Parties to Supplement the Record, which consists of Global documents

marked “confidential” that were produced in court litigation pursuant to a still-extant protective order.

Respectfully submitted,

The image shows two handwritten signatures in black ink. The first signature, 'Eric Jeffrey', is written in a cursive style and is positioned above a horizontal line. The second signature, 'Anjali Vohra', is also in cursive and is written to the right of the first signature, partially overlapping it.

Eric Jeffrey

Anjali Vohra

Nixon Peabody LLP

799 9th Street, N.W., Suite 500

Washington, D.C. 20001

(202) 585-8000

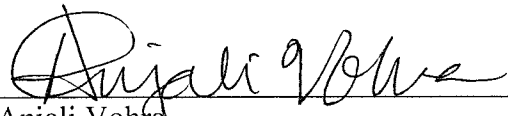
CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing Respondents' Response to Motion to Intervene by email and first class mail to the following:

Marcus A. Nussbaum, Esq.
P.O. Box 245599
Brooklyn, NY 11224
Marcus.nussbaum@gmail.com

Seth M. Katz, Esq.
P.O. Box 245599
Brooklyn, NY 11224

Dated at Washington, DC, this 15th day of August, 2016.



Anjali Vohra
Counsel for Respondents